Filing to: FCC
In response to: 25-133

Subject: GMRS Radio Regulation

Comment:
Several GMRS requirements are laid out under Title 47, Chapter 1, Subchapter D, 95.1787. In particular, a.4 specifies that “The antenna must be a non-removable integral part of the GMRS unit.”

This requirement is detrimental. Removable antennas have many advantages:

- Smaller size: Radios with removable antenna can be stored in small spaces when they are not being used.
- Repair-ability: Due to their form factor, antennas are often the first thing to break on handheld radios, due to potential stresses without relief. Allowing antennas to be removed means that in the event of damage, the antenna can be replaced without the replacement of the entire unit. This saves time, money, and valuable resources.
- Barrier to entry: The requirement effectively restricts GMRS radios to be dedicated solely to radios designed specifically for GMRS. This means the radio will either have GMRS only, or will be most costly due to the development of multiple radios inside the unit.

Instead, it should be considered that the requirement be changed to DIRECTLY regulate potential issues. For example, prohibiting any equipment that causes the radio to operate outside of GPRS power or frequency allocations. This allows the use of removable antennas, so long as they perform inside of the specification.